

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

ROBERT A. WILLIAMS,)	
)	
Plaintiff,)	Case No. 4:21-CV-966-SRC
)	
v.)	ORAL ARGUMENT REQUESTED
)	
LG CHEM, LTD. and LG CHEM)	
AMERICA, INC.,)	
)	
Defendants.)	

**DEFENDANT LG CHEM, LTD.’S
RULE 60(b) MOTION TO RECONSIDER OR, IN THE ALTERNATIVE, AMEND AND
CERTIFY FOR INTERLOCUTORY APPEAL PURSUANT TO 28 U.S.C. § 1292(b)**

Defendant LG Chem, Ltd. (“LG Chem”), by and through undersigned counsel, and pursuant to Rule 60(b) of the Federal Rules of Civil Procedure and 28 U.S.C. § 1292, respectfully moves this Court to reconsider its March 24, 2022 Order denying LG Chem’s Motion to Dismiss for Lack of Personal Jurisdiction or, in the alternative, amend and certify its March 24, 2022 Order for leave to appeal to the United States Court of Appeals for the Eighth Circuit.

This Rule 60(b) Motion to Reconsider is made on the grounds that the Court’s Order depends on a misapprehension of facts, was based on errors of fact and law, and is inconsistent with both constitutional due process and Missouri’s long-arm statute.

In the alternative, LG Chem respectfully requests that the Court amend its March 24, 2022 Order and certify it for interlocutory appeal because the Order readily satisfies all prerequisites set forth in § 1292(b).

For the reasons set forth above and in the Memorandum in Support filed with and incorporated into this Motion as if fully set forth herein, LG Chem respectfully asks the Court to reconsider its Order dated March 24, 2022 denying LG Chem’s Motion to Dismiss and instead

dismiss LG Chem from this action for lack of personal jurisdiction. In the alternative, LG Chem respectfully asks the Court to amend and certify its March 24, 2022 Order for interlocutory appeal pursuant to 28 U.S.C. § 1292(b) by including the following language:

The Court is of the opinion that this Order involves a controlling question of law as to which there is substantial ground for difference of opinion and that an immediate appeal from this Order as authorized by 28 U.S.C. § 1292(b) may materially advance the ultimate termination of this litigation.

LG Chem respectfully requests a hearing on this Motion.

Dated this 1st day of April, 2022.

/s/ Brian R. Plegge

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Attorneys for Defendant LG Chem, Ltd.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **DEFENDANT LG CHEM, LTD.’S RULE 60(b) MOTION TO RECONSIDER OR, IN THE ALTERNATIVE, AMEND AND CERTIFY FOR INTERLOCUTORY APPEAL PURSUANT TO 28 U.S.C. § 1292(b)** was served on counsel of record by the Court’s electronic filing system on this 1st day of April 2022.

/s/ Brian Plegge
Brian R. Plegge